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Via ECF

August 1, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States District Court- District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

***Re: In re: Johnson & Johnson Talcum Powder Products Marketing, Sales
Practices and Products Liability Litigation - MDL 2738***

Dear Magistrate Judge Singh:

We write in response to Plaintiffs' letter of this morning on expert compensation (ECF 33052). We believe that the correct procedural way to seek the relief Plaintiffs propose is for Plaintiffs to follow the rules and meet and confer and if the issue is not resolved, then to seek permission to file a discovery motion and then if granted, to file a formal discovery motion. Once that is done, we will submit a formal opposition within the time required by the rules. We do question the timeliness of this application as expert discovery is long closed and the defense followed what the plaintiffs produced – invoices for the work done by the experts in this particular litigation.

Thank you for your consideration of these matters.

Respectfully,

/s/ Susan M. Sharko

Susan M. Sharko

Sean C. Garrett

**FAEGRE DRINKER BIDDLE & REATH
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All counsel of record (via ECF)